

To: McCoy, Erin[McCoy.Erin@epa.gov]
From: Gts
Sent: Wed 4/6/2016 6:45:06 PM
Subject: Re: Visit

Thank you

Sent from my iPhone

On Apr 6, 2016, at 1:44 PM, McCoy, Erin <McCoy.Erin@epa.gov> wrote:

I'm sorry, I forgot to attach the picture. Here it is. Let me know if you have any questions.
Thanks!

<image002.gif>Erin McCoy, P.G. | Remedial Project Manager

EPA Region 7 | Superfund Division | Iowa Nebraska Branch

11201 Renner Blvd | Lenexa, KS 66219

Phone: 913.551.7977

mccoy.erin@epa.gov | www.epa.gov

From: McCoy, Erin
Sent: Wednesday, April 06, 2016 1:33 PM
To: 'GTSI' <gtsi2000@yahoo.com>; Peterson, Mary <Peterson.Mary@epa.gov>; Rita A. Conner <raconner@dmgov.org>
Cc: Mills Brian (Safety) <brian.mills@titan-intl.com>; Mike Troyanovich <mike.troyanovich@titan-intl.com>; Damitio Jeremy (Legal) <jeremy.damitio@titan-intl.com>; Pemberton, Scott <Pemberton.Scott@epa.gov>; Cozad, David <Cozad.David@epa.gov>; Albert, Eric (ENRD) <Eric.Albert@usdoj.gov>
Subject: RE: Visit

Gazi, it was a pleasure to finally meet you and see the site. I am currently working to develop the scope of work and costs for the site characterization and will send you the information once it is complete. I anticipate having the preliminary cost estimate for demolition in May, though these estimates may change once the actual sample results are

complete. Once I have the preliminary cost estimates for demolition, I will forward these to you so that the negotiations can continue. These cost estimates will be needed in order for EPA to prepare a ROD amendment for OU2/4. After the ROD is complete, we can discuss how to proceed with demolition. EPA cannot conduct or authorize the demolition of the buildings until the ROD amendment for OU2/4 is complete and work plans have been approved. Our site characterization work will also include sampling in and around the South Pond Area. Due to recent ecological risks that have been identified and the potential for human exposures that may be associated with the recreational land use scenario envisioned by the city, it is important to gather the data needed to support a human health risk assessment and to evaluate appropriate cleanup actions for the South Pond Area. This evaluation will be conducted as part of the OU2/4 ROD amendment.-

You mentioned in your e-mail that you do not believe that the contamination in the buildings could have contributed to the concentrations observed during the initial sampling of the South Pond Area via storm water runoff because the buildings are at lower elevations than the soils adjacent to the pond. You further state that this is documented in the EPA records. Could you please let me know which documents you are referring to? Being new to the project, I have not been able to read 30+ years of the record yet. However, looking at the 2013 Five-Year Review (Page 4, Section 3.1, first paragraph), surface water flows from north to south, meaning the surface water would flow from the buildings to the South Pond Area. Conditions I observed at the site support the surface water flow from north to south, as indicated by the attached picture I took of the pump and treat system from near the former foundation of buildings 4 and 5 (I was facing west). And with the demolition of buildings 4 and 5, there is a possibility that the contamination in these buildings could have migrated to the South Pond Area since the contamination was no longer sealed within the buildings. So, if you can provide me with a reference to documents in the file that conflict with the potential surface migration mentioned in the Five-Year Review, I'd appreciate it. I want to make sure and review all relevant information, and we will further evaluate surface drainage pathways during the site characterization work.

Also, thank you for agreeing to address the drums so quickly. I look forward to hearing from you regarding the contents of the drums and their ultimate disposal.

-

I will be in touch soon regarding the plans and schedule for the site characterization work. Please let me know if you have any questions. Thanks!

<image002.gif>Erin McCoy, P.G. | Remedial Project Manager

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From: GTSI [<mailto:gtsi2000@yahoo.com>]

Sent: Friday, April 01, 2016 12:37 PM

To: Peterson, Mary <Peterson.Mary@epa.gov>; McCoy, Erin <McCoy.Erin@epa.gov>; Rita A. Conner <raconner@dmgov.org>

Cc: Mills Brian (Safety) <brian.mills@titan-intl.com>; Mike Troyanovich <mike.troyanovich@titan-intl.com>; Damitio Jeremy (Legal) <jeremy.damitio@titan-intl.com>

Subject: Visit

Thank you all for the visit on such bad weather. It was a pleasure meeting you all. I hope we can work on this project to benefit all parties involved and proudly remove an eye sore from a beautiful City to make it even better.

Titan is committed to this project if it can reach a fair outcome (to all parties) hence we need your help to assist DICO so that the proposals may be presented to the CEO and the Board of Directors for approval.

Once Mary and I define the project better, then we have the warm season to at least characterize the buildings to be readied for demolition & disposal (options). On the other hand, I agree with Mary and Erin that the buildings as a whole (except the office building) must be characterized for the Pesticides Aldrin, Dieldrin & PCB to insure proper disposal & avoid any future regulatory issues. I am also aware that before any demo action is taken that the contractor will survey for Asbestos as required by State & City Ordinances.

I understand Mary's concern about the source of PCB in the insulation being the infamous silver tape to attach to the beams or walls. The remedial firm/ Demolition Company can be advised by USEP to separate these tapes (PCB was a component of the glue) and test the insulation separately before disposal whereas the silver tape is isolated to be sent to a proper TSCA facility.

Mary's suggestion to involve the Region sampling team to conduct the characterization will insure that no delays are experienced due to the waiting period to approve a submitted sampling plan by an outside contractor. Please have Erin send me more details on this proposal specifically the projected costs associated with it.

DICO will maintain an onsite Remedial coordinator during the proposed cleanup (to completion) to effectively communicate with the EPA site coordinators

One final note regarding the OU4 South-pond: I urge you to review the EPA reports in the 1990's regarding the South Pond where "No further Remedial Actions" were required aside from the monitoring that was recently conducted by USEPA. After listening to Mary's explanation and the common realization that the buildings are at a lower elevation than the soils adjacent to the pond (as stated in the EPA records) , is obvious that the buildings did not contribute through storm water to the residues identified via initial sampling. I believe the contaminants that were found could have only resulted from the 1993 (and earlier) floods. I do not want to put the horse behind the cart so soon but I firmly believe that the South Pond should be discussed within the 3 Legal groups DICO, EPA & DOJ) since it was not part of DICO responsibility for the past 2 1/2 decades but that of the DICHEM Customer group.

Thank you for your help and have a nice weekend

Respectfully

GGeorge

G. George, Ph.D

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<Treatment Building facing W.jpg>